

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PATRICK WOOD CRUSIUS,

Defendant.

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

CAUSE NO.: EP-20-CR-00389-DCG

**JOINT NOTICE OF AGREED FILING DEADLINE**

The United States of America and Patrick Wood Crusius, by and through undersigned counsel, file this notice in response to the Court's Order of September 1, 2022 (ECF 239). The parties have met and conferred, and have agreed to propose January 17, 2023 as the date by which the Government will file any notice under 18 U.S.C. § 3593(a).

Respectfully submitted,

ASHLEY C. HOFF  
UNITED STATES ATTORNEY

/s/ Ian Martinez Hanna  
IAN MARTINEZ HANNA  
Assistant United States Attorney  
Texas Bar # 24057885  
700 East San Antonio, Suite 200  
El Paso, TX 79901

/s/ Gregory E. McDonald  
GREGORY E. McDONALD  
Assistant United States Attorney  
Texas Bar # 13547300  
700 East San Antonio, Suite 200  
El Paso, TX 79901

/s/ Joe A. Spencer  
JOE A. SPENCER  
Counsel for the Defendant  
1009 Montana  
El Paso, TX 79902  
915-532-5562  
Joe@joespencerlaw.com  
Texas Bar # 18921800

/s/ Rebecca L. Hudsmith  
REBECCA L. HUDSMITH  
Counsel for the Defendant  
Office of the Federal Public Defender for the  
Middle and Western Districts of Louisiana  
102 Versailles Blvd., Suite 816  
Lafayette, LA 70501  
337-262-6339  
Rebecca\_Hudsmith@fd.org  
Louisiana Bar # 7052

/s/ Michael Warbel  
MICHAEL WARBEL  
Trial Attorney  
Criminal Division  
950 Constitution Ave. NW  
Washington, DC 20530  
Ohio Bar # 0074369

/s/ Mark Stevens  
MARK STEVENS  
Counsel for the Defendant  
310 S. St. Mary's Street  
Tower of Life Building, Suite 1920  
San Antonio, TX 78205  
210-226-1433  
mark@markstevenslaw.com  
Texas Bar # 1918420

KRISTEN M. CLARKE  
ASSISTANT ATTORNEY GENERAL  
CIVIL RIGHTS DIVISION

/s/ Kyle Boynton  
KYLE BOYNTON  
Trial Attorney  
Criminal Section  
Civil Rights Division  
950 Pennsylvania Ave. NW  
Washington, DC 20530  
202-598-0449  
kyle.boynton@usdoj.gov  
Virginia Bar # 92123

/s/ Felix Valenzuela  
FELIX VALENZUELA  
Counsel for the Defendant  
Valenzuela Law Firm  
P.O. Box 26186  
El Paso, TX 79926  
915-209-2719  
felix@valenzuela-law.com  
Texas Bar # 24076745

*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 16, 2022, a true and correct copy of the foregoing instrument was filed with the Clerk of the Court using the CM/ECF System and, since it is a sealed document, a true and correct copy of the foregoing instrument was provided to the parties:

/s/ Ian Martinez Hanna  
IAN MARTINEZ HANNA  
Assistant United States Attorney

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**PATRICK WOOD CRUSIUS,**

**Defendant.**

§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§

**CAUSE NO.: EP-20-CR-00389-DCG**

**ORDER**

Should the Government elect to file any notice under 18 U.S.C. § 3593(a) in this case, it  
**SHALL** do so by January 17, 2023.

**So ORDERED and SIGNED** this \_\_\_\_\_ day of September, 2022.

---

DAVID C. GUADERRAMA  
UNITED STATES DISTRICT JUDGE